

MEMORANDUM ENDORSED



BUFFALO PUBLIC SCHOOLS
Office of Legal Counsel
65 Niagara Square, Room 713 City Hall
Buffalo, New York 14202
Phone (716) 816-3102
Fax (716) 851-3030
requinn@buffaloschools.org

Nathaniel J. Kuzma
General Counsel

March 14, 2023

HON. GREGORY H. WOODS
United States Magistrate Judge
United States District Court
500 North Pearl Street, Room 2260
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/15/2023

*Re: United States of America and States of the United States, ex rel.
Donoghue v. Richard Carranza, et al., No. 1:20-cv-5396 (GWH)(SDH)*

Dear Judge Woods:

We represent the Defendants Buffalo Public School District and Kriner Cash, in his official capacity as Superintendent ("Buffalo Defendants"), in the above action.

We write to respectfully join in the New York City and other Defendants requests for a thirty-day extension of time to move for attorneys' fees under 31 U.S.C. 3730(d)(4)(Dkt. #260). Like the other Defendants, this extension will afford the Buffalo Defendants additional time to properly evaluate the relevant legal standards and their applicability to this case. It will also promote judicial efficiency by avoiding piecemeal litigation of the attorneys' fees issues.

This is the request for an extension of time to file this motion.

Respectfully yours,

NATHANIEL KUZMA, ESQ.
General Counsel

/s/ Robert E. Quinn

By: Robert E. Quinn
Assistant Legal Counsel

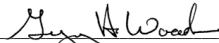
CC: All Counsel (*by ECF*)

Application granted. The deadline for the Buffalo Defendants to file a motion for attorney's fees is extended to April 13, 2023.

The Clerk of Court is respectfully directed to terminate the motion pending at Dkt. No. 275.

SO ORDERED.

Dated: March 15, 2023
New York, New York


GREGORY H. WOODS
United States District Judge

"Putting Children and Families First to Ensure High Academic Achievement for All"